

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9

DEFENDANTS

ZOOM DEPOSITION OF SARA REVELL

Taken at the Instance of the Plaintiff
with All Parties Appearing by Zoom Videoconferencing
On October 29, 2020
At 10:30 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS PLAINTIFF
VS CIVIL ACTION NO. 3:19-CV-00234-NBB-RP
MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9 DEFENDANTS

ZOOM DEPOSITION OF SARA REVELL

Taken at the Instance of the Plaintiff
With All Parties Appearing by Zoom Videoconferencing
On October 29, 2020
At 10:30 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

APPEARANCES:

JAMES D. WAIDE III, ESQUIRE
RACHEL PIERCE WAIDE, ESQUIRE
Waide & Associates, P.A.
Post Office Box 1357
Tupelo, Mississippi 38802

REPRESENTING THE PLAINTIFF

TIMOTHY M. PEEPLES, ESQUIRE
Daniel Coker Horton & Bell, P.A.
Post Office Box 1396
Oxford, Mississippi 38655

REPRESENTING MTC & JESSE WILLIAMS

DAVID LONG-DANIELS, ESQUIRE
JACOB R. DEAN, ESQUIRE
Greenberg Traurig, LLP
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305

ELIZABETH ROSS HADLEY, ESQUIRE
Greenberg Traurig, LLP
300 West 6th Street, Suite 2050
Austin, Texas 78701

REPRESENTING MHM HEALTH PROFESSIONALS, D/B/A
CENTURION PROFESSIONALS

ALSO PRESENT: DR. AMY WOODS

SHARRON ALLEN & ASSOCIATES
Post Office Box 1731
Jackson, Mississippi 39215
(601) 825-6339

3

1		
2	TABLE OF CONTENTS	
3		
4	Style	1
5	Appearances	2
6	Table of Contents	3
7	Examination by Mr. Waide	4
8	Exhibit 1 - E-Mail String Williams/Revell/Molina With Memo from Jesse Williams	5
9	Deposition Concluded	34
10	Certificate of Court Reporter	35
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23	SHARRON ALLEN & ASSOCIATES Post Office Box 1731 Jackson, Mississippi 39215 (601) 825-6339	
24		
25		

4

1 SARA REVELL,
2 having first been duly sworn, was examined and
3 testified as follows:
4 EXAMINATION
5 BY MR. WAIDE:
6 Q. Ma'am, your name is Sara Revell?
7 A. That's correct.
8 Q. Where do you live?
9 A. Blountstown, Florida.
10 Q. By whom are you employed?
11 A. Management & Training Corporation.
12 Q. How long have you worked for Management
13 & Training Corporation?
14 A. Twenty-five months. I started
15 September 17, 2018.
16 Q. Do you have a background in
17 corrections?
18 A. I do.
19 Q. How many years of experience do you
20 have in corrections?
21 A. Working on my 36th.
22 Q. What's your educational level?
23 A. I attended -- well, I have a bachelor's
24 degree in social work, and I studied at the
25 University of Kentucky at the School of Social

5

1 work in the master's program.
 2 (EXHIBIT 1 MARKED)
 3 BY MR. WAIDE:
 4 Q. You have some exhibits there. Did we
 5 send you some exhibits?
 6 A. I do.
 7 Q. If you would, look at the first one
 8 that you have there. It's an e-mail from
 9 yourself to Sergio Molina.
 10 A. Yes.
 11 Q. First of all, as of June 27, 2019, what
 12 was your position with Management & Training
 13 Corporation?
 14 A. Regional vice president, Region 4.
 15 Q. To whom did you report?
 16 A. To Bernie Warner, senior vice
 17 president.
 18 Q. Who were your immediate subordinates?
 19 A. My immediate subordinates would be
 20 warden Jesse Williams at Marshall. At the time
 21 it would have been Jody Bradley, the warden at
 22 Wilkinsons. Also Jerry Buscher, the warden at
 23 Gadsden Correctional Facility in Florida, and
 24 Frank Robin Williams, who is the regional
 25 director for Region 4. And I think I've covered

7

1 supervisor. I don't recall.
 2 Q. I take it you did not discuss it with
 3 Dr. Woods.
 4 A. That's correct.
 5 Q. As a superior of Warden Williams, I
 6 would assume you had the authority to overrule
 7 his decisions if you wanted to? Am I right or
 8 wrong?
 9 A. I would at the end of the day. I would
 10 have that authority. But I very rarely overrule
 11 wardens' decisions. I try to support them
 12 whenever possible.
 13 Q. All right. I want to just get you to
 14 explain what you mean by the e-mail, and then
 15 I'm going to have a few more questions for you.
 16 A. Sure.
 17 Q. First of all -- I'll let you put this
 18 in your own words if you don't think this is
 19 fair, but you say here, "Please see document
 20 from Warden Williams."
 21 And what you're talking about is an
 22 e-mail that Warden Williams received from an
 23 employee of Centurion in which the Centurion
 24 employee makes allegations that Dr. Woods has
 25 been talking to a state legislator about staff

6

1 it.
 2 Q. Who is Sergio Molina?
 3 A. Sergio Molina is another senior vice
 4 president of marketing. I'm going to say
 5 marketing development and partnership roughly is
 6 his title.
 7 Q. Are y'all in equivalent positions? Are
 8 y'all on the same level?
 9 A. No, he's a superior. He is a senior
 10 vice president; I'm a vice president.
 11 Q. All right. The subject of this e-mail
 12 is an e-mail that y'all had gotten from Warden
 13 Williams relating to Amy Woods. Am I correct?
 14 A. That's correct.
 15 Q. Did y'all discuss -- other than
 16 discussing this with Mr. Sergio Molina, did you
 17 discuss this with anybody else in the company,
 18 this incident with Ms. Woods?
 19 A. Warden Williams.
 20 Q. Anybody else?
 21 A. With Warden Williams. I don't know if
 22 I had a conversation with . . .
 23 Q. I'm sorry. I didn't understand you.
 24 A. I'm not -- I don't know if I had a
 25 conversation about this with my immediate

8

1 shortages. Is that fair, or do you want to
 2 recharacterize that?
 3 A. The only thing that I would clarify is
 4 that it sounded like you said that he forwarded
 5 me an e-mail from a staff member. When I read
 6 this e-mail, I assumed the document was written
 7 by Warden Williams.
 8 Q. I think it is. I think you're right.
 9 But that was the subject of the document that
 10 Warden Williams wrote. I described that
 11 correctly. Right?
 12 A. Yes, sir.
 13 Q. Am I correct in saying that this
 14 communication that came from the Centurion
 15 employee, a man named Travis Day, am I correct
 16 in saying that that communication from Travis
 17 Day is the event that ultimately led to the
 18 termination of Dr. Woods -- I sorry -- not to
 19 the termination, to the revocation of her
 20 ability to come onto the facility?
 21 MR. LONG-DANIELS: Objection to form.
 22 A. Yes, sir.
 23 BY MR. WAIDE:
 24 Q. So far as you know, was Mr. Day acting
 25 properly? I mean, was he doing anything

9

1 improper so far as his job duties at Centurion
2 were concerned in sending this e-mail, so far as
3 you know?

4 MR. LONG-DANIELS: Objection to form.

5 A. NO, sir.

6 BY MR. WAIDE:

7 Q. It's kind of strange about these.
8 Lawyers will be objecting, but there's not a
9 judge here, so just ignore the objections and go
10 ahead and answer since there's no judge here.
11 okay?

12 A. That's not my -- that's not my -- that
13 isn't my experience, but okay.

14 Q. Okay.

15 MR. PEEPLES: Sara, just for
16 clarification: Unless I tell you not to
17 answer, you can go ahead and answer.

18 THE WITNESS: Okay.

19 MR. PEEPLES: David or I might object
20 to the form; but unless somebody tells you
21 not to answer, you can go ahead and
22 answer.

23 THE WITNESS: Yeah. You want to make
24 sure the objection is on the record. I
25 understand.

11

1 that everybody in the medical department answers
2 to the HSA.

3 Q. All right. Would it be your
4 understanding he was acting according to his job
5 duties or acting pursuant to his job duties when
6 he communicated with your company, with MTC?

7 MR. LONG-DANIELS: Objection to form.

8 A. Yes.

9 BY MR. WAIDE:

10 Q. All right. Do you have any reason to
11 think he was not -- you know what the phrase
12 "course and scope of employment"? Do you know
13 what that phrase means?

14 A. Yes, sir, I do.

15 Q. So far as you knew, was Mr. Day acting
16 in the course and scope of his employment when
17 he told y'all whatever it is -- when he told
18 warden Williams here whatever it is he told him?

19 MR. LONG-DANIELS: Objection to form.

20 A. That would be my understanding.

21 BY MR. WAIDE:

22 Q. Let me go back to the e-mail. Do you
23 know -- as we sit here today, do you have any
24 information as to whether or not Mr. Day was
25 telling the truth when he said Ms. Woods had

10

1 MR. PEEPLES: Yes. Thank you.

2 MR. WAIDE: She knows more about this
3 than we do, Tim.

4 MR. PEEPLES: I told her she did,
5 yes. She's been through it more than I
6 have.

7 MR. LONG-DANIELS: He's a tricky
8 lawyer, so be careful with him.

9 BY MR. WAIDE:

10 Q. Who do you understand Travis Day was?
11 what was his position with Centurion?

12 A. The hospital administrator. HSA we
13 normally call them. House services
14 administrator.

15 Q. All right. What did you understand his
16 job was? What did you understand he was doing?

17 A. Well, my understanding --

18 Q. Mr. Day's job.

19 A. -- in general about health services
20 administrators is that they oversee the
21 operations of the medical department at the
22 facility, as well as supervise staff at times.
23 I don't know the exact chain of command
24 and/or -- well, I should say organizational
25 structure. But chain of command normally is

12

1 been talking to the state representative? Do
2 you know one way or the other?

3 A. Do I know one way or the other? No.

4 Q. All right. Have you received
5 information since then that the state legislator
6 whom he claims he was talking to says that's not
7 true, that he in fact had not talked to her?
8 Were you aware of that? Are you aware of that?

9 A. I am not.

10 Q. Okay. Do I understand, then, that
11 you -- at least you personally -- have not ever
12 investigated the issue of whether or not what
13 Mr. Day said was true or false?

14 A. I have not.

15 Q. And to your knowledge, has anybody from
16 your company ever investigated that?

17 A. Not to my knowledge. Well, I should
18 say -- yeah, I guess "not to my knowledge" is
19 the right way to say that.

20 Q. All right. I'm not talking about any
21 investigation made after the suit was filed.
22 I'm really talking about before this suit was
23 filed.

24 A. Well, I certainly -- again, I certainly
25 take the experience and the integrity of the

13

1 warden to heart when he relays a conversation
2 and a decision. You know, that is substantial
3 in, you know, whether or not I support a
4 decision or not by the individual that operates
5 a correctional facility.

6 Q. However, in this case, though, what
7 warden Williams was acting on was based on what
8 Mr. Day had said, was it not?

9 MR. LONG-DANIELS: Objection to form.

10 A. That's correct.

11 BY MR. WAIDE:

12 Q. And you don't know Mr. Day.

13 A. I think we've met once, or we had met
14 once.

15 Q. Without making some investigation of
16 this, then, such as, say, by talking to
17 Dr. Woods or by talking to the state legislator
18 involved, you wouldn't have any way of knowing
19 whether what Day said was true or not.

20 MR. PEEPLES: Object to the form.

21 You can answer.

22 MR. LONG-DANIELS: Same objection.

23 A. That's correct.

24 BY MR. WAIDE:

25 Q. All right. Let me go ahead, and the

14

1 second sentence is, I guess, one of the main
2 things I want to ask you to explain.

3 It says "I would ask that we don't
4 forward." Tell me what are you talking about
5 and what are you not wanting forwarded?

6 A. We don't forward documents that discuss
7 personnel information.

8 Q. Who would normally -- now, forward to
9 whom? Who did you have in mind you didn't want
10 it forwarded to?

11 A. Well, I was aware that Sergio had had a
12 conversation with a state representative. And
13 obviously internal personnel documents, internal
14 personnel matters we don't, you know, forward
15 communications that are -- that deal with
16 personnel matters. That's simply what that
17 meant.

18 Q. All right. Let me see if I understand
19 that. Sergio, your employee, he had been
20 talking to a --

21 A. He's not my employee. He's a superior.

22 Q. I mean your company's employee. I'm
23 sorry.

24 Your superior had told you that he had
25 talked to a state representative?

15

1 A. Yes.

2 Q. What representative did he talk to?

3 A. I believe it was Bill Kinkade, although
4 I don't have anything that would say that for
5 certain.

6 Q. All right. And what did he relay to
7 you he talked to Bill Kinkade about?

8 A. About Dr. Woods's termination.

9 Q. All right. What was the substance of
10 it? Was Kinkade wanting her terminated or not
11 wanting her terminated?

12 A. My understanding is that Kinkade was
13 inquiring as to the circumstances surrounding
14 her. And "termination" is the wrong word
15 because MTC did not terminate Dr. Woods, but our
16 disallowing her from continuing to practice at
17 the Marshall Correctional Facility.

18 Q. All right. Was it your understanding
19 that Representative Kinkade wanted her to be
20 able to stay on at the facility or did not want
21 her to stay on, or did you have any
22 understanding one way or the other?

23 A. I didn't. I did not have any
24 understanding one way or the other.

25 Q. So is what you're saying about this is

16

1 it was Kinkade that you didn't want to tell?
2 You didn't want Kinkade to know about this
3 e-mail that Warden Williams had sent?

4 A. Again, we would not forward personnel
5 information to anyone, to include Kinkade or
6 anybody else that may have had interest in it
7 outside of the company.

8 Q. Would that be -- even though this is a
9 matter about staff shortage at the prison, you
10 wouldn't want a state representative to know
11 about that?

12 MR. PEEPLES: Object to the form.

13 A. There are definite ways that are proper
14 for state representatives to know about the
15 conditions at correctional facilities.

16 BY MR. WAIDE:

17 Q. All right. You would not want the
18 state representative to get his information from
19 Dr. Woods, then. Is that what you're saying?

20 A. That's correct. Or any other staff
21 member, sir, other than by proper channels,
22 which may be through the warden's office if the
23 warden properly asked for permission to share
24 that information.

25 Q. So in substance, then, if a staff

17

1 member believes there are staff shortages and
2 that that staff shortage is jeopardizing
3 prisoner safety, you would not want that
4 communicated to a state representative. I'm
5 sorry. You would not want the employee to
6 communicate that information to a state
7 representative. Am I correct?

8 A. There are proper channels for -- that's
9 a security, an internal security issue. It's
10 normally not just about staff shortages. If the
11 state representative, for example, says, "Are
12 you short of staff?" and the staff member says,
13 "Yes, we're short of staff," and that's the
14 entire context of the conversation, that's one
15 thing; but that's not what is alleged here. And
16 internal security discussions, there are ways
17 for those things to be communicated.

18 Q. All right. Look at the --

19 A. And there are folks that really should
20 be communicating them, and it's not a contract
21 physician at the facility.

22 Q. All right. If you would, describe for
23 me what is it that Dr. Woods said that you would
24 not want communicated to a state representative.
25 what is it allegedly said that you would not

19

1 in a position to have the authority to do so.

2 Q. All right. Other than the number of
3 people working on a shift, is there anything
4 else that she allegedly said that she should not
5 have said?

6 MR. PEEPLES: Object to the form.
7 That's a mischaracterization of what she
8 just said.

9 MR. WAIDE: I thought the only thing
10 she described was the number of people on
11 a shift.

12 BY MR. WAIDE:

13 Q. What other information --

14 A. Well, if you look at what was
15 articulated in paragraph 1 of the exhibit, again
16 the --

17 Q. Tell me what page number you're looking
18 at.

19 A. Well, the memo.

20 Q. You mean Bates No. 41?

21 A. Paragraph 1. It's not what it says on
22 mine; but, okay, I believe you there.

23 Q. Look at the bottom. The number's on
24 the bottom there.

25 A. Okay. Yep, there it is.

18

1 want communicated to a state representative?

2 A. By her. There is all sorts of
3 information that state representatives are privy
4 to; but it isn't about necessarily whether or
5 not the state representative has issue or has
6 the ability to get this information, it's how
7 it's requested, who communicates it. There are
8 proper channels to do that.

9 Q. Here's my question: Turn over to the
10 next page, page 41, and it describes here -- as
11 well as page 43 -- those describe what it is
12 that Dr. Woods had allegedly said. And my
13 question --

14 A. Yes.

15 Q. My question to you is: What is it
16 specifically that Dr. Woods allegedly said that
17 she should not be saying to a state
18 representative? What did she say that was
19 improperly communicated to a state
20 representative -- or allegedly did she say?

21 A. So when you talk about the number of
22 folks that are on shift or the number of folks
23 that aren't on shift, that's internal security
24 information, and internal security information
25 should not be articulated by folks that are not

20

1 So the cumulative of that
2 information -- number of cars in the parking
3 lot, the number of security employees at work on
4 various shifts and days, along with sharing
5 information -- excuse me -- not having enough
6 staff on given days.

7 Q. Read the whole thing.

8 A. That is not appropriate.

9 Q. The rest of that sentence was "... on
10 given days to escort offenders to medical." Do
11 you see that?

12 A. Yes.

13 Q. All right. So far as you're concerned,
14 would Dr. Woods, if she had made a statement
15 that there was, quote, not having enough staff
16 on given days to escort offenders to medical,
17 would that statement be improper?

18 A. Yes.

19 Q. What do you think the first amendment
20 of the United States Constitution means?

21 MR. PEEPLES: Don't answer that.

22 That calls for a legal conclusion. She's
23 not going to answer legal questions.

24 MR. WAIDE: Well, under the rules,
25 now, they're not supposed to refrain from

21

1 answering a question unless you're
2 claiming a privilege. Is she taking the
3 Fifth Amendment? What's going on here,
4 Tim?

5 MR. PEEPLES: She can answer it, but
6 she's not a lawyer. That's an unfair
7 question for a lay witness to ask. She's
8 not here to give you answers to legal
9 questions. You can ask her any kind of
10 fact question you want. I don't know how
11 you expect her to answer that. She's not
12 a lawyer.

13 BY MR. WAIDE:

14 Q. Do you not agree with me that a person,
15 even though they're an employee, has a right to
16 express their opinions on matters of public
17 concern? Do you agree with that or disagree
18 with it?

19 MR. PEEPLES: Same objection as
20 before. It's a recharacterization of your
21 last question.

22 Sara, if you understood and are able
23 to answer, you can.

24 BY MR. WAIDE:

25 Q. Let me rephrase it. Do you agree with

22

1 me that a person, even though they may be
2 working for you, has the right as a citizen to
3 express their opinions on matters of public
4 concern?

5 MR. PEEPLES: That's literally the
6 same question, just rephrased. Same
7 objection.

8 You can answer, Sara.

9 A. Restate the question, please.

10 BY MR. WAIDE:

11 Q. Do you agree that, even though
12 Dr. Woods may be working for -- well, not for
13 you, but working for Centurion -- nevertheless
14 she has a right to express her opinion on
15 matters of public concern? Do you agree with
16 that or do you not agree with that?

17 MR. PEEPLES: Object to the form of
18 the question.

19 A. Not when it endangers the safety of
20 inmates and staff at a correctional facility.
21 No, I don't agree with that.

22 BY MR. WAIDE:

23 Q. So making the statement they have a
24 shortage of staff in your opinion endangers
25 safety?

23

1 A. It can in specific context, yes, and
2 when shared along with -- and when shared along
3 with other information.

4 Q. What other information?

5 A. Well, she just -- the only thing that
6 was said was that -- that was not the only thing
7 said, was that there was a shortage of staff.

8 Q. Let me go back to your e-mail on Bates
9 page 40. The last sentence says "If we need to
10 return her to duty, we will certainly do so."
11 what did you mean by that?

12 A. That if the -- I worked for the federal
13 government for 36 years. Sometimes we made
14 decisions, and they had to be reversed because
15 of the political whims. And so in this case,
16 that's simply what I meant -- was that if either
17 anyone in the company of higher authority
18 believed that we needed to have her reinstated,
19 that we would do so. And normally the only, you
20 know, reason that would happen was because we
21 felt that it was politically wise to do so.

22 Q. I see. You might reinstate her if you
23 thought it was politically wise to reinstate
24 her? Is that what you're saying?

25 A. If folks with a higher pay grade than

24

1 myself thought it was, yes. I was supporting
2 the warden's decision; but if I was told to
3 reinstate her, I would follow the rules. I
4 would follow the direction given to me.

5 Q. I see. Did Mr. Sergio ever respond
6 then? Your superior, did he ever respond as to
7 whether to reinstate her?

8 A. He did not change my decision to
9 support the warden.

10 Q. Did he e-mail you back?

11 A. I don't believe so.

12 Q. What did he tell you after you sent him
13 this e-mail?

14 A. "Thank you." And, you know, again, if
15 he would have thought that we needed to reverse
16 the decision, I would have been told to do so.

17 Q. You don't remember what -- do you
18 remember what he said after you sent him this
19 e-mail?

20 A. I do not.

21 Q. Did either one of y'all ever check with
22 Centurion to find out about how this was going
23 to jeopardize medical care for prisoners if you
24 fired the doctor?

25 A. It goes without saying that whenever

25

1 you have a vacancy that you want to fill it as
2 soon as possible. Again, I understand that
3 wholeheartedly, having served as a warden for
4 eight years at three different facilities. When
5 you have a vacancy in any department, you want
6 to fill it as expeditiously as possible.

7 Q. My question, though, doesn't relate to
8 filling the vacancy; it relates to whether you
9 should create the vacancy.

10 Did you or, to your knowledge, anybody
11 else in your company ever confer with Centurion
12 about whether they needed Dr. Woods in order to
13 promote prisoner safety? Prisoner health and
14 safety.

15 MR. LONG-DANIELS: Objection to the
16 preamble.

17 A. No, because when -- when the behavior
18 of the individual hampers security and/or, you
19 know, is something that is against, you know,
20 what is allowed to do -- having conversations
21 about security issues outside of the chain of
22 command and outside of what's allowed -- you
23 know, you deal, then, with the operational
24 issues that you have as a result.

25

27

1 notified MDOC of his decision, as I believe he
2 indicates that he did in his e-mail.

3 Q. Did Warden Williams have the authority
4 to veto this decision if he wanted to, to your
5 knowledge?

6 A. Yes.

7 Q. And he knew about it and did not veto
8 it. Am I correct?

9 MR. LONG-DANIELS: Objection to form.

10 A. Do you mean Jerry Williams? You said
11 "Warden Williams."

12 BY MR. WAIDE:

13 Q. You're so right. I'm sorry to get you
14 confused. I'm so sorry. Or get myself
15 confused.

16 Did Jerry Williams know about this
17 decision and approve of it?

18 MR. LONG-DANIELS: Objection to form.

19 A. That's my understanding. And it says
20 so in the e-mail, that Warden Williams spoke
21 with Jerry Williams, the DCI. And that would be
22 his normal course of communication on all
23 matters such as this.

24 BY MR. WAIDE:

25 Q. Here's my question: To your knowledge,

26

1 BY MR. WAIDE:

2 Q. The question of whether or not having
3 Dr. Woods banned from the facility would be
4 harmful to efforts to protect the patients'
5 health and safety never arose, never came up,
6 and was never considered. Am I correct?

7 MR. PEEPLES: Object to the form.

8 A. Not by myself.

9 BY MR. WAIDE:

10 Q. Did anybody from Centurion ever talk to
11 you about the effect of your banning Dr. Woods
12 and whether or not they needed Dr. Woods so as
13 to provide medical treatment for prisoners?

14 A. No.

15 Q. What about Jerry Williams? To your
16 knowledge, did Jerry Williams from the
17 Mississippi State Department of Corrections have
18 any involvement in this?

19 MR. LONG-DANIELS: Object to form.

20 A. My understanding is that Warden
21 Williams may have had a conversation with him
22 about it, but not with myself.

23 BY MR. WAIDE:

24 Q. Is it your understanding --

25 A. Because Warden Williams would have

28

1 Jerry Williams would have known that Dr. Woods
2 was in the process of being banned from the
3 facility? Had been banned or was in the process
4 of being banned?

5 MR. LONG-DANIELS: Object to the
6 form.

7 A. That's my understanding.

8 BY MR. WAIDE:

9 Q. And as the person to whom y'all
10 reported at the Department of Corrections, could
11 Jerry Williams have vetoed that decision if he
12 wanted to?

13 A. You know, I don't know the answer to
14 that question.

15 Q. Is it your understanding that y'all did
16 consult with Jerry Williams, though, before the
17 decision was final?

18 A. Yes, but it wouldn't have been to ask
19 permission; it would have been to inform.

20 Q. Okay. Well, you may have answered
21 this, and I apologize if you have: Is it your
22 understanding that Jerry Williams, if he
23 disagreed with this decision, could veto it and
24 could have told y'all "We don't want y'all to
25 jeopardize prisoner safety by firing the doctor

29

1 down there"?

2 MR. PEEPLES: Object to the form.

3 A. You know, I don't know the answer to
4 that question. Obviously Centurion contracted
5 with MDOC, not MTC. So, technically, I don't
6 know the answer to that question.

7 BY MR. WAIDE:

8 Q. Well, we're not talking about firing --
9 I didn't mean firing her; I meant banning her
10 from coming onto the prison facility.

11 MR. LONG-DANIELS: Object to the
12 form.

13 A. I don't know the answer to that
14 question.

15 BY MR. WAIDE:

16 Q. Okay. Would you have approved this
17 decision if you had known that Travis Day was
18 lying and in fact Dr. Woods never talked to the
19 state representative about the shortage of
20 staff?

21 MR. LONG-DANIELS: Object to the
22 form.

23 BY MR. WAIDE:

24 Q. If you had known he was lying about it,
25 would you have still fired her anyway -- I mean

31

1 don't . . . That's not the information I had.

2 That's not the information I had.

3 BY MR. WAIDE:

4 Q. Who told you Day was telling the truth?

5 A. The warden. The warden represented --

6 Q. How did he know?

7 A. I can't answer for how would a warden,
8 you know . . .

9 Q. Well, he's not a mind reader as far as
10 I know, is he? He's not a prophet or anything.

11 As far as you know, he just relied on
12 what Day told him and said, "okay, let's ban her
13 from the facility because Day wants her banned."

14 MR. LONG-DANIELS: Object to form.

15 MR. PEEPLES: Object to form.

16 BY MR. WAIDE:

17 Q. Am I correct? Is that what happened?

18 MR. LONG-DANIELS: Object to form.

19 A. That's truly not a question.

20 BY MR. WAIDE:

21 Q. The question is: Do you have any
22 information that she was banned for any reason
23 other than that Day told Williams that she had
24 been talking to the representative?

25 A. That's my understanding.

30

1 still banned her from the facility anyway?

2 MR. LONG-DANIELS: Object to form.

3 A. That's a hypothetical.

4 BY MR. WAIDE:

5 Q. On what basis would you -- assuming Day
6 was lying, on what basis would you have
7 terminated her from the facility? Why would you
8 terminate her -- why would you keep her off the
9 facility if you had known Day was lying?

10 MR. LONG-DANIELS: Object to form.

11 A. Again, that's a hypothetical because I
12 don't -- I don't have any information that Day
13 was lying.

14 BY MR. WAIDE:

15 Q. Nobody's ever told you that the
16 representative said he never did talk to Woods
17 about this? Nobody has ever told you that?

18 A. No, sir, and I think I answered that
19 question earlier.

20 Q. Okay. Well, let's assume
21 hypothetically that Day was lying. Would you
22 then approve the decision of Williams to
23 terminate Dr. Woods?

24 MR. LONG-DANIELS: Object to form.

25 A. That's a hypothetical question. I

32

1 Q. Do you think there was something
2 behind -- do you have any information there was
3 something behind getting rid of Dr. Woods other
4 than the fact that Day had said she had been
5 talking to Williams about staff shortages?

6 A. I have no reason to believe that.

7 MR. LONG-DANIELS: Object to form.

8 BY MR. WAIDE:

9 Q. You didn't know she had been
10 complaining about there not being adequate
11 treatment for prisoners' health needs, that
12 there had been a delay in getting them over so
13 they could be treated for their medical needs?
14 You didn't know anything about that?

15 A. No, sir.

16 Q. Would you want to have an employee --
17 I'm sorry. Would you want somebody on your
18 premises who was complaining about your company
19 not taking prisoners over to care for their
20 medical needs?

21 MR. LONG-DANIELS: Object to form.

22 A. I as a warden always wanted to know
23 what staff thought about operations, which is
24 why I encouraged staff to use proper chain of
25 command in communicating concerns. I always

33

1 wanted to know.
 2 BY MR. WAIDE:
 3 Q. Don't y'all have to file reports with
 4 the State Department of Corrections about the
 5 number of medical appointments that have been
 6 missed because your company didn't transport the
 7 prisoners? Don't y'all have to make reports
 8 about that?
 9 A. We do.
 10 Q. And aren't those in the form of
 11 spreadsheets, monthly spreadsheets?
 12 A. There are different formats, depending
 13 on the facility, how they transfer them to the
 14 MDOC. And the compliance manager for the state
 15 normally has involvement in that as well.
 16 Q. Who's the person from your company
 17 that's supposed to transmit that information to
 18 the state?
 19 A. I don't know that. For each specific
 20 institution it's different. I don't know who
 21 does it for each facility.
 22 Q. Have you ever seen any information your
 23 company was falsifying those reports and not
 24 accurately transmitting to the state the number
 25 of appointments being missed?

35

1 CERTIFICATE OF DEPONENT
 2 I, SARA REVELL, deponent in the deposition
 3 taken in the herein styled and numbered cause,
 4 certify that I have examined the foregoing 34 pages,
 5 being the total number of pages relating to my
 6 testimony, as to the correctness thereof, and that
 7 after reading said pages, and subject to any
 8 corrections I may have attached hereto as a
 9 Deponent's Corrections Sheet, I find them to contain
 10 a full, true, and correct transcript of the
 11 testimony as given by me.
 12 This the ____ day of _____, 2020.
 13
 14 _____
 15 SARA REVELL
 16
 17 STATE OF MISSISSIPPI
 18 COUNTY OF _____
 19
 20 SUBSCRIBED AND SWORN TO BEFORE ME, the
 21 undersigned authority, on this the ____ day of
 22 _____, 2020.
 23 _____
 24 NOTARY PUBLIC
 25 My Commission Expires:

34

1 A. No, sir.
 2 MR. WAIDE: That's all I have.
 3 MR. LONG-DANIELS: I have no
 4 questions.
 5 MR. PEEPLES: I have no questions.
 6 MR. WAIDE: Thank y'all very much.
 7 MR. PEEPLES: Thank you, Sara.
 8 THE WITNESS: Thank you.
 9 MR. WAIDE: Y'all have a good day.
 10 Tim, do you want to read and sign?
 11 MR. PEEPLES: Yeah.
 12 Sharron, will you send it to me, and
 13 I'll get it to her.
 14 COURT REPORTER: Yes.
 15 (DEPOSITION CONCLUDED AT 11:03 A.M.)
 16 * * * * *
 17
 18
 19
 20
 21
 22
 23
 24
 25

36

1 DEPONENT'S CORRECTION SHEET
 2
 3 PAGE LINE CORRECTION
 4 _____
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14
 15 _____
 16 SARA REVELL
 17
 18 STATE OF MISSISSIPPI
 19 COUNTY OF _____
 20
 21 SWORN AND SUBSCRIBED TO BEFORE ME, this the
 22 ____ day of _____, 2020.
 23 _____
 24 NOTARY PUBLIC
 25 My Commission Expires:

CERTIFICATE OF COURT REPORTER

I, SHARRON F. ALLEN, Certified Shorthand Reporter and Notary Public in and for the State of Mississippi at large, hereby certify that the foregoing 36 pages contain a full, true, and correct transcript of the proceedings as taken by me at the time and place heretofore stated in the aforementioned matter by stenotype and later reduced to typewritten form by me to the best of my skill and ability by means of computer-aided transcription.

I further certify that I placed the witness under oath to truthfully answer all questions in this matter under the authority vested in me by the State of Mississippi.

I further certify that I am not in the employ of or related to any counsel or party in this matter and have no interest, monetary or otherwise, as to the final outcome of this proceeding.

WITNESS MY SIGNATURE AND SEAL, this the 29th day of October, 2020.

Sharron F. Allen, CSR, RPR
SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

My Commission Expires:
November 5, 2023